

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TILLIE SALTZMAN, Individually and On  
Behalf of All Others Similarly Situated,

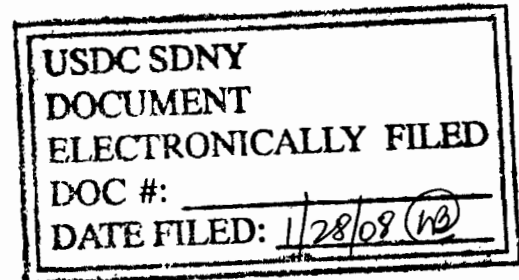
Plaintiff,

vs.

CITIGROUP INC., CHARLES O. PRINCE,  
ROBERT E. RUBIN, STEPHEN R. VOLK,  
SALLIE L. KRAWCHECK, GARY L.  
CRITTENDEN and ROBERT DRUSKIN,

Defendants.

CIVIL ACTION NO. 07-9901-SHS



LENNARD HAMMERSCHLAG,  
Individually, and On Behalf of All Others  
Similarly Situated,

Plaintiff,

vs.

CITIGROUP INC., CHARLES PRINCE,  
SALLIE KRAWCHECK, GARY  
CRITTENDEN,

Defendants.

CIVIL ACTION NO. 07-10258-~~JE~~ (SAB)

NOTICE OF MOTION OF THE OHIO STATE TEACHERS RETIREMENT  
SYSTEM AND THE ATTORNEY GENERAL OF THE STATE OF OHIO TO  
DISQUALIFY COUNSEL

+ ORDER SETTING  
A RETURN DATE

*Feb 8, 2008 at 2 p.m.*

PLEASE TAKE NOTICE that on a ~~date and time as may be set by the Court,~~  
before the Honorable Sidney H. Stein, at the United States District Court for the Southern  
District of New York, located at the Daniel Patrick Moynihan United States Courthouse,  
500 Pearl Street, Courtroom 23A, New York, New York 10007, the State Teachers  
Retirement System of Ohio (“Ohio STRS”), and the Attorney General of the State of  
Ohio (the “Ohio Attorney General” and, with Ohio STRS, “Ohio”) will respectfully move  
this Court for entry of an Order disqualifying Schiffrin Barroway Topaz & Kessler, LLP  
(“Schiffrin Barroway”) and Entwistle & Cappucci LLP (‘‘Entwistle’’) from representing  
the Global Pension Funds<sup>1</sup> or otherwise acting adversely to the interests of Ohio in this  
matter.

This Motion is supported by the accompanying Memorandum of Law in support  
thereof, the Declaration of Honorable Marc Dann and William J. Neville filed herewith,  
the Declaration of Professor Bruce A. Green filed herewith, the pleadings and other files,  
and such other written or oral argument as may be permitted by the Court.

Based on the foregoing, Ohio respectfully requests that the Court issue an Order  
disqualifying Schiffrin Barroway and Entwistle from representing the Global Pension  
Funds in opposition to Ohio or otherwise acting adversely to the interests of

---

<sup>1</sup> Schiffrin Barroway and Entwistle represent the “Global Pension Funds” group. The Global Pension Funds are comprised of the Public Employees’ Retirement Association of Colorado (“Colorado PERA”), Tennessee Consolidated Retirement System (“TCRS”), Sjunde AP-Fonden (“AP7”), Fjärde APFonden, (“AP4”), and Pensionskassernes Administration A/S (“PKA”).

Ohio in this matter and grant such other and further relief as the Court may deem just and proper.

Dated: January 25, 2008

Respectfully submitted,

**MARC DANN**

**ATTORNEY GENERAL OF OHIO**

Christopher R. Geidner,  
Counsel to the Attorney General  
Andrea L. Seidt,  
Deputy Chief Counsel  
30 E. Broad St., 17th Floor  
Columbus, Ohio 43215  
Telephone: 614-466-4320  
Facsimile: 614-466-5087

*Counsel to the Ohio State Teachers'  
Retirement System*

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

Max W. Berger (MB-5010)  
Gerald H. Silk (GS-4565)  
Avi Josefson (AJ-3532)  
Noam Mandel (NM-0203)  
1285 Avenue of the Americas, 38th Floor  
New York, New York 10019  
Telephone: 212-554-1400  
Facsimile: 212-554-1444

*Counsel to the Office of the Ohio  
Attorney General and the Ohio State  
Teachers' Retirement System*

1/25/08  
So ordered  
J. H. Miller